

23 April 2026

Candice Le Roux
Rio Tinto
Central Park, Level 12
152-158 St Georges Terrace,
Perth WA 6000

Email: Candice.LeRoux@riotinto.com

Dear Candice,

Wildflower Camp Rebuild - 10 Clearing Principles Assessment

1.0 Introduction

1.1 Background

Rio Tinto Iron Ore (Rio Tinto), on behalf of Hamersley Iron Ore Pty Limited, is proposing to undertake rebuilding of the existing decommissioned Wildflower Camp site (the Project), located approximately 85 km east of Tom Price, along Packsaddle Road, in the Shire of Ashburton, Western Australia (Figure 1). The camp is planned to accommodate approximately 400 personnel from the track renewals workforce, supporting ongoing works across the Integrated Rail Network (IRN).

Rio Tinto is proposing to clear up to 35 ha of native vegetation for the purpose of rebuilding Wildflower Camp. The clearing will occur within the Application Area, a 130.57 ha area that has been subject to a flora, vegetation and basic fauna assessment by AECOM Pty Ltd (AECOM). The clearing footprint is expected to reduce as the project scope and design are further refined. The area has been subject to significant historical disturbance from previous iterations of the Wildflower Camp.

All clearing of native vegetation in Western Australia must be completed under an approved Native Vegetation Clearing Permit (NVCP), unless an exemption applies under the *Environmental Protection (Clearing of native Vegetation) Regulations 2004*. As there are no NVCP exemptions that apply to this Project, an NVCP is required.

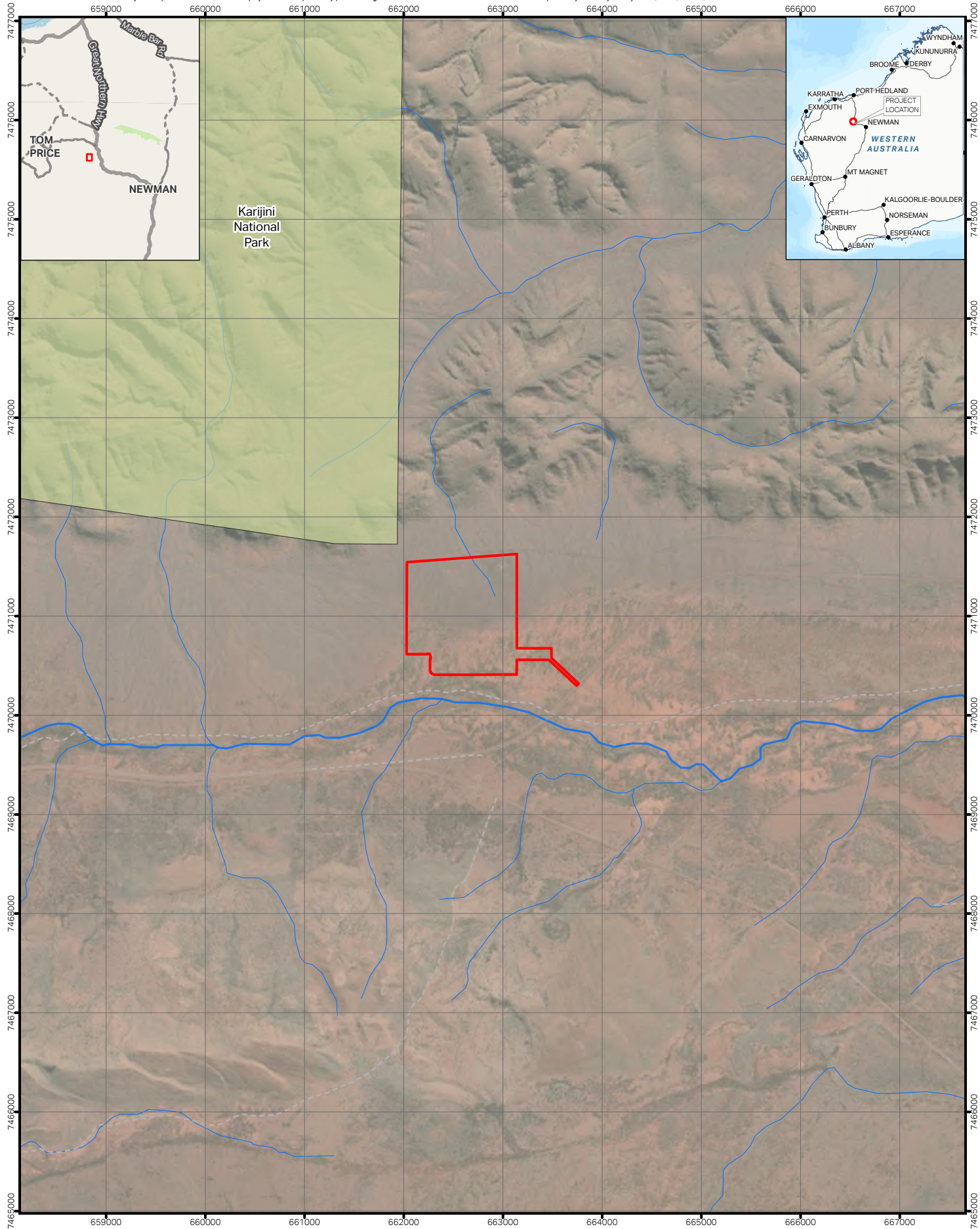
Rio Tinto engaged AECOM to complete a flora, vegetation and a basic fauna assessment of the area and the subsequent survey report to support a NVCP application. This letter supports that report and assesses the proposed clearing against the 10 Clearing Principles set out in Schedule 5 of the *Environmental Protection Act 1986* (EP Act) (DWER 2014).

A summary of the survey findings is provided in Section 2.0.

Based on AECOM's assessment of the Application Area against the 10 Clearing Principles, it is determined that:

- Principles (a), (b), (c), (d), (e), (f), (g), (h), (i), (j) are not at variance.

The full assessment against the 10 Clearing Principles is presented in Section 3.0.



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GDA2020 MGA ZONE 50

LEGEND

Application Area

National Park

DBCA - Legislated Lands and Waters (DBCA-011)

Application Area

RIO TINTO

**WILDFLOWER CAMP REBUILD - 10
CLEARING PRINCIPLES ASSESSMENT**

**Figure
1**

2.0 Survey background

AECOM (2026) conducted a desktop assessment using Commonwealth and State databases and flora and fauna data provided by Rio Tinto. Following the desktop assessment, AECOM undertook a flora and vegetation assessment, targeted flora searches for significant and introduced flora and a basic fauna assessment. The survey area covers the Application Area, as well as the adjacent area, totalling 169.58 ha, located in the Shire of Ashburton in the Pilbara region of Western Australia.

Senior Botanist Celia Mitchell (collection permit FB62000077-3), supported by Sophie Moss (collection permit FB62000754), Nina Sergeev (collection permit FB62000544) and Candice Le Roux (collection permit FB62000436), conducted the survey between the 8th to 10th April and on 13th April 2026.

No significant limitations were identified that would impact survey results. A summary of the survey findings is presented below.

2.1 Desktop assessment

AECOM (2026) conducted a comprehensive desktop assessment to determine the likelihood of occurrence for flora, fauna and vegetation types, listed as either threatened under the *Biodiversity Conservation Act 2016* (BC Act) or the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), or classified as Priority by the Department of Biodiversity Conservation and Attractions (DBCA).

Vegetation

AECOM has conducted a search of DBCA's threatened and priority ecological community database and the EPBC Act's Protected Matters Search Tool (PMST) within a 50 km buffer around the survey area. The search identified five Priority Ecological Communities (PECs) within 50 km from the survey area, which are listed below:

- Brockman Iron cracking clay communities of the Hamersley Range – Priority 1 (P1)
- Coolibah-lignum flats: *Eucalyptus victrix* over lignum community in the Pilbara
 - Coolibah and mulga (*Acacia aneura*) woodland over lignum and tussock grasses on clay plains (Coondewanna Flats and Wanna Munna Flats) - P3
 - Coolibah woodlands over lignum (*Duma florulenta*) over swamp wandiree (Lake Robinson is the only known occurrence) – P1
 - Coolibah woodland over lignum and silky browntop (*Eulalia aurea*) (two occurrences known on Mt Bruce Flats) – P1
- Kumina Land System – P3
- West Angelas Cracking-Clays – P1
- Riparian Flora and Plant Communities of Springs and River Pools with High Water Permanence of the Pilbara Region – P2.

No Threatened Ecological Communities (TECs) occur within 50 km of the survey area.

Flora

AECOM has conducted a desktop search for significant flora using the Rio Tinto flora database, the DBCA threatened and priority flora database and PMST within a 100 km buffer from the survey area. The search identified 82 significant flora species with the potential to occur in the survey area. Of these, 80 species are listed as Priority flora. The remaining two species are listed under the BC Act or EPBC Act, as follows:

- *Tetradlea butcheriana* (listed as Endangered under the BC Act)
- *Thryptomene wittweri* (Vulnerable under the BC Act and EPBC Act).

Of the 80 Priority species, 16 species were assessed as having a high likelihood of occurrence within the survey area, 13 species with a moderate likelihood, and 52 with a low or negligible likelihood of occurrence.

The species considered with a high likelihood of occurrence within the survey area included:

- Priority 3:
 - *Acacia effusa*
 - *Aristida jerichoensis* var. *subspinulifera*
 - *Aristida lazaridis*
 - *Eremophila pusilliflora*
 - *Euphorbia australis* var. *glabra*
 - *Euphorbia inappendiculata* var. *queenslandica*
 - *Indigofera rivularis*
 - *Iotasperma sessilifolium*
 - *Oxalis* sp. Pilbara (M.E. Trudgen 12725)
 - *Pentalepis trichodesmoides* subsp. *hispida*
 - *Rostellularia adscendens* var. *latifolia*
 - *Streptoglossa* sp. Cracking clays (S. van Leeuwen et al. PBS 7353)
 - *Swainsona thompsoniana*
 - *Themeda* sp. Hamersley Station (M.E. Trudgen 11431)
 - *Triodia* sp. Mt Ella (M.E. Trudgen 12739)
 - *Vittadinia* sp. Coondewanna Flats (S. van Leeuwen 4684).

Fauna

The desktop search for significant fauna was conducted using the Rio Tinto fauna database, the DBCA threatened and priority fauna database and PMST within a 100 km buffer from the survey area. A total of 44 threatened or priority fauna species were identified in the search, comprising 24 bird species, 12 mammal, seven reptile species and one fish.

Of the 44 species identified, nine species were assessed as having a high likelihood of occurrence within the survey area, four with a moderate likelihood of occurrence, 14 with a low likelihood, and the remaining 17 species with a negligible likelihood to occur within the survey area.

The species assessed with a high likelihood of occurrence within the survey area are as follows:

- Threatened fauna:
 - *Dasyurus hallucatus* Northern Quoll – Endangered under the BC Act and EPBC Act
 - *Liasis olivaceus barroni* Olive Python – Vulnerable under the BC Act and EPBC Act
 - *Macroderma gigas* Ghost Bat – Vulnerable under the BC Act and EPBC Act
 - *Macrotis lagotis* Greater Bilby – Vulnerable under the BC Act and EPBC Act
 - *Pezoporus occidentalis* Night Parrot – Critically Endangered under BC Act and EPBC Act
- Priority 2:
 - *Lerista macropisthopus remota* Unpatterned Robust Slider (Robertson Range)
 - *Underwoodisaurus seorsus* Pilbara Barking Gecko
- Priority 4:
 - *Leggadina lakedownensis* Short-tailed Mouse
 - *Pseudomys chapmani* Western Pebble-mound Mouse.

2.2 Field survey results

AECOM conducted a field survey between the 8th to 10th April and on 13th April 2026. The survey was undertaken approximately 6-8 weeks post-wet season, which is the optimal survey timing for vegetation surveys in the Pilbara bioregion (EPA 2016).

A summary of the survey findings is provided below and relates only to the Application Area of 130.57 ha within the broader survey area.

Vegetation

Two native vegetation types were mapped within the Application Area:

- AaSaTm - *Acacia aptaneura* low open woodland – 62.46 ha in Very Good to Excellent condition
- EgHgTp - *Eucalyptus gamophylla* mallee woodland – 45.48 ha in Very Good to Excellent condition.

The remaining area (22.63 ha) was highly modified (rehabilitation or cleared areas).

No vegetation representing TECs or PECs were identified in the broader survey area.

The vegetation types and condition are shown in Figure 2.

Flora

AECOM recorded 118 flora species from 29 families within the Application Area, including three weed species. No Threatened flora species listed under the BC Act or EPBC Act were recorded within the Application Area. One Priority species was recorded within the Application Area - *Vittadinia* sp. Coondewanna Flats (S. van Leeuwen 4684) (P3). Additionally, one range extension was recorded within the Application Area - *Halgania erecta*. This species is known to the Gibson Desert, Great Victoria Desert, Little Sandy Desert, Gascoyne and the Murchison bioregions, with the nearest record more than 150 km south of the broader survey area. Three weed species were recorded within the Application Area - **Bidens bipinnata*, **Malvastrum americanum* and **Melinis repens*.

Fauna

A total of 40 fauna species were recorded within the Application Area, including four reptiles, two mammals, and 34 birds.

No Threatened fauna species listed under the EPBC Act, BC Act or by DBCA were recorded during the survey.

AECOM identified three fauna habitats within the Application Area, including:

- Clay Plain – 62.30 ha in Very Good to Excellent condition. This habitat is characterised by scattered native shrubs over hummock grasses on lower slopes. Within this habitat, Mulga Woodland microhabitat was scattered throughout. In this microhabitat there are stands of mulga on clay substrates and a high density of grass understory that provide shelter and foraging resources.
- Stony Plain – 45.64 ha in Very Good to Excellent condition. This habitat is characterised by stony and pebbly substrate with a moderate cover of grasses including *Triodia* spp. with scattered low trees of *Eucalypt* spp.
- Rehabilitated area – 16.47 ha mostly in Poor to Good condition. This is a previously cleared area with regrowth of vegetation, including *Acacia*, *Triodia* and *Eucalypt* spp.

The remaining 6.16 ha is disturbed area, mostly in Completely Degraded condition.

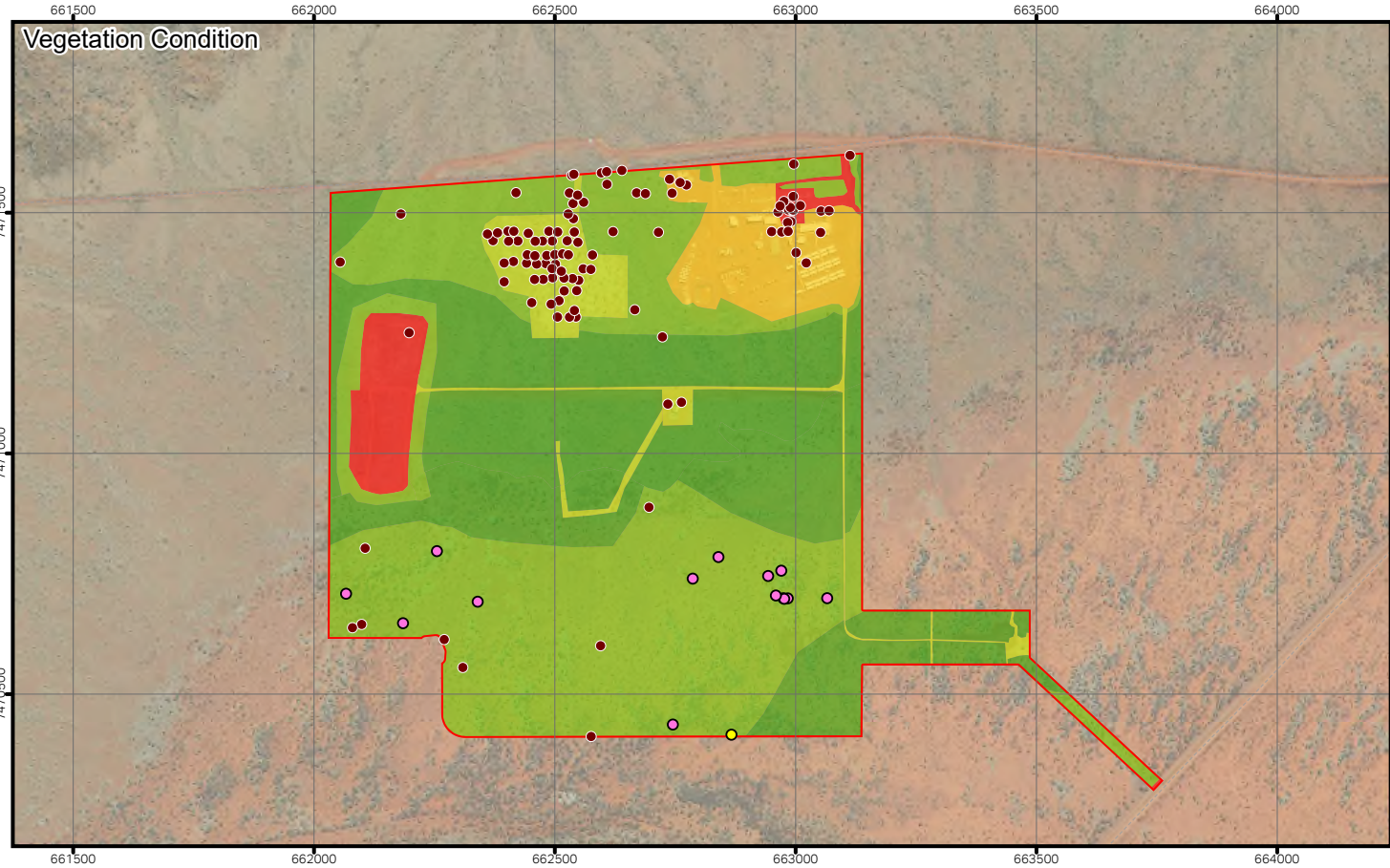
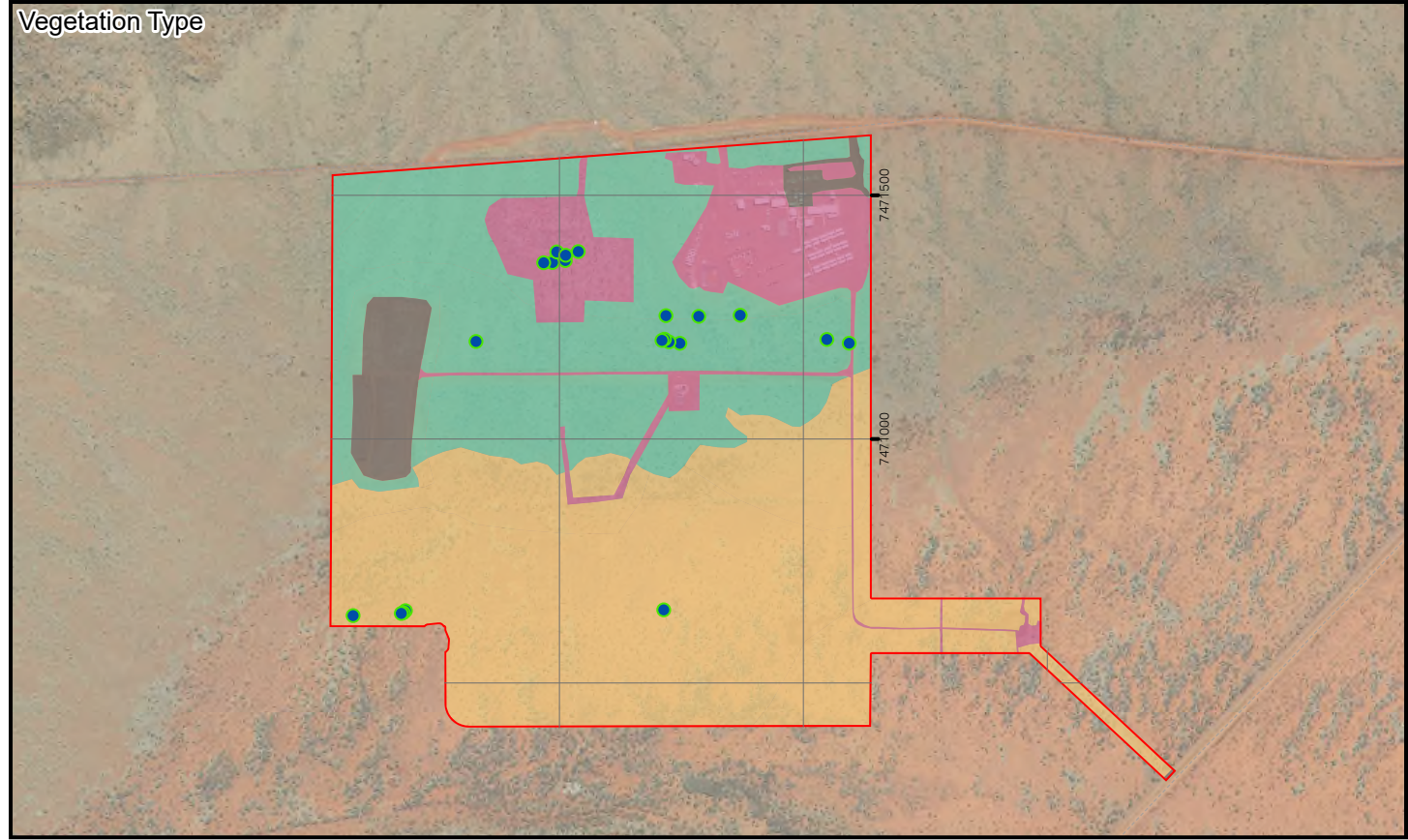
The fauna habitat types are presented in Figure 3.

The fauna habitats were assessed post-survey, with the Application Area identified as suitable for three significant fauna species and as supporting habitat for seven species. No habitat types were assessed as critical habitat.

The significant fauna species that were assessed as having suitable or supporting habitat within the Application Area are listed in Table 1.

Table 1 Significant fauna with suitable or supporting habitat in the Application Area

Habitat assessment	Habitat	Species	Conservation Status
Suitable habitat	Clay Plain and Mulga Woodland Microhabitat.	Short-tailed Mouse - <i>Leggadina lakedownensis</i>	Priority 4
		Unpatterned Robust Slider - <i>Lerista macropisthopus remota</i>	Priority 2
	Stony Plain and Rehabilitated area - Depending on progress of rehabilitation.	Western Pebble-mound Mouse - <i>Pseudomys chapmani</i>	Priority 4
Supporting habitat	Clay Plain	Greater Bilby - <i>Macrotis lagotis</i>	Vulnerable under the BC Act and EPBC Act
		Pilbara Leaf Nosed Bat - <i>Rhinonictis aurantia</i>	Vulnerable under the BC Act and EPBC Act
		Grey Falcon - <i>Falco hypoleucos</i>	Vulnerable under the BC Act and EPBC Act
	Stony Plain and Rehabilitated area - Depending on progress of rehabilitation.	Night Parrot - <i>Pezoporus occidentalis</i>	Critically Endangered under BC Act and EPBC Act
		Pilbara Olive Python - <i>Liasis olivaceus barroni</i>	Vulnerable under the BC Act and EPBC Act
		Ghost Bat - <i>Macroderma gigas</i>	Vulnerable under the BC Act and EPBC Act
		Northern Quoll - <i>Dasyurus hallucatus</i>	Endangered under the BC Act and EPBC Act
		Grey Falcon - <i>Falco hypoleucos</i>	Vulnerable under the BC Act and EPBC Act
		Pilbara Leaf Nosed Bat - <i>Rhinonictis aurantia</i>	Vulnerable under the BC Act and EPBC Act



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0 50 100 150 200 metres
GDA2020 MGA ZONE 50

DATA SOURCES: Base Data: (s) Based on information provided by and with the permission of the Western Australian Land Information Authority trading as Landgate (2010)
Service Layer Credits: Minor Roads, Main Roads, Freeways & Highways, JMS

LEGEND

Application Area

Vegetation Type

AaSaTm EgHgTp

Rehabilitation

Cleared

Significant Flora

Vittadinia sp. Coondewanna Flats, P3

Vegetation Condition

0.1 - Completely Degraded

0.4 - Poor

0.6 - Good

0.8 - Very Good

1 - Excellent

Weeds

**Bidens bipinnata*

**Malvastrum americanum*

**Melinis repens*

Vegetation Type and Condition Mapping

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WILDFLOWER CAMP REBUILD - 10 CLEARING PRINCIPLES ASSESSMENT

Figure 2

LEGEND		Fauna Habitat
 Application Area	 Clay Plain	
	 Disturbed	
	 Rehab	
	 Stony Plain	
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		<i>WILDFLOWER CAMP REBUILD - 10 CLEARING PRINCIPLES ASSESSMENT</i>
		Figure 3

3.0 Actions to avoid and minimise clearing

The Project requires clearing of up to 35 ha of native vegetation. The desktop assessment and field survey (AECOM 2026) indicate that the Application Area does not contain any Threatened flora or TECs and is unlikely to provide habitat that is critical for the survival of significant fauna. The vegetation within the Application Area is considered common within the region and does not contain any unique landforms.

The Project will largely fall within previously disturbed areas, with the proposed camp marking its fourth iteration. Access will be along existing tracks where possible to minimise new disturbance and clearing activities will be undertaken under an NVCP issued under Section 51A of the EP Act.

4.0 Assessment against the 10 Clearing Principles

The proposed clearing has been assessed against each of the clearing principles in accordance with the Department of Environmental Regulation (DER, now Department of Water and Environmental Regulation [DWER]) guideline “A guide to the assessment of applications to clear native vegetation under Part V Division 2 of the Environment Protection Act 1986” (DWER 2014).

Table 2 Assessment against principle (a)

a) Native vegetation should not be cleared if it comprises a high level of biological diversity.
Not at variance with this principle.
Vegetation Two native vegetation types were recorded within the proposed Application Area, in Very Good to Excellent condition, including: • AaSaTm - Open Mulga woodland over hummock grasses and mixed tussock grasses on clay plains (62.46 ha). • EgHgTp - <i>Eucalyptus gamophylla</i> mallee woodland over mixed shrubs on undulating stony plains (45.48 ha). The remaining 22.63 ha is rehabilitated and cleared area. No vegetation types representing TECs or PECs were identified within the Application Area. The vegetation types recorded were not considered locally significant and likely extend well beyond the Application Area, including into Karijini National Park, which occurs 207 m north-west of the Application Area. None of the vegetation types recorded are restricted in distribution or provide a role as refuge for conservation significant fauna, nor are any representative of groundwater dependent ecosystems. One pre-European vegetation type, Association 18, was mapped across the proposed Application Area. This vegetation is described as low woodland, open low woodland or sparse <i>Acacia aneura</i> (Mulga) and associated species (Beard, et al. 2013). Flora AECOM recorded 115 native flora species and three weed species, from 29 families, within the Application Area, none of which represent Threatened flora species listed under the BC Act or EPBC Act. Flora diversity within the Application Area is typical for the region. One conservation significant species, <i>Vittadinia</i> sp. Coondewanna Flats (S. van Leeuwen 4684) (Priority 3) was recorded within the Application Area. A total of 91 individuals of this species were recorded at 27 locations across the broader survey area, of which 65 individuals were recorded within the Application Area. It was recorded mostly within the EgHgTp vegetation type. Sixteen other Priority species had a high pre-survey likelihood of occurrence within the broader survey area and were not recorded during the survey. Their post-survey likelihood has been reduced to negligible or low. One range extension was recorded within the Application Area - <i>Halganina erecta</i>. This species is known to the Gibson Desert, Great Victoria Desert, Little Sandy Desert, Gascoyne and the Murchison bioregions, with the nearest record more than 150 km south of the broader survey area.

a) Native vegetation should not be cleared if it comprises a high level of biological diversity.

Three introduced species recorded within the Application Area, representing common Pilbara weeds. None of the recorded weeds species are listed as a Weed of National Significance (WoNS), or under the *Biosecurity and Agriculture Management Act 2007* (BAM Act).

Fauna

AECOM recorded three fauna habitats within the Application Area:

- Clay Plain (62.30 ha) - characterised by scattered native shrubs over hummock grasses on lower slopes. Within this habitat, Mulga Woodland microhabitat was scattered throughout. In this microhabitat there are stands of mulga on clay substrates and a high density of grass understory that provide shelter and foraging resources for fauna. This habitat was assessed in Very Good to Excellent condition.
- Stony Plain (45.64 ha) - characterised by stony and pebbly substrate with a moderate cover of grasses including *Triodia* spp. with scattered low trees of *Eucalypt* spp. This habitat was assessed in Very Good to Excellent condition.
- Rehabilitated area (16.47 ha) - a previously cleared area with regrowth of vegetation, including *Acacia*, *Triodia* and *Eucalypt* spp, mostly in Poor to Good condition.

The remaining 6.16 ha is disturbed area, mostly in Completely Degraded condition.

These habitats were assessed as suitable for the following significant fauna:

- Short-tailed Mouse (P4) - Clay Plain
- Unpatterned Robust Slider (P2) - Clay Plain
- Western Pebble-mound Mouse (P4) - Stony Plain and Rehabilitated habitat.

No habitats were considered critical.

No Threatened fauna species listed under the EPBC Act, BC Act or by DBCA were recorded within the Application Area.

Given the recorded number of flora species is typical for similar sized surveys in the region and given the absence of restricted vegetation/fauna habitat types, the proposed clearing is not at variance with this principle.

Table 3 Assessment against principle (b)

b) Native vegetation should not be cleared if it comprises whole or part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia.

Not at variance with this principle.

AECOM (2026) recorded three fauna habitats within the Application Area, as follows:

- Clay Plain - 62.30 ha of scattered native shrubs over hummock grasses on lower slopes in Very Good to Excellent condition. Includes Mulga woodland microhabitat. Within this habitat, Mulga Woodland microhabitat was scattered throughout. In this microhabitat there are stands of mulga on clay substrates and a high density of grass understory that provide shelter and foraging resources.
- Stony Plain - 45.64 ha of stony and pebbly substrate with a moderate cover of grasses, including *Triodia* spp., with scattered low trees of *Eucalypt* spp. in Very Good to Excellent condition.
- Rehabilitated area - 16.47 ha of rehabilitation of previously cleared areas, including *Acacia*, *Triodia* and *Eucalypt* spp. Regrowth in Poor to Good condition.

The remaining 6.16 ha is disturbed area, mostly in Completely Degraded condition. While Clay Plains and Stony Plains provide suitable or supporting habitats for significant fauna, they are not considered restricted or ecologically significant compared to the broader region.

These fauna habitats were assessed post-survey, with the Application Area identified as suitable for three significant fauna species and as supporting habitat for seven species. No habitat types were assessed as Critical.

The significant fauna species that were assessed as having suitable or supporting habitat within the Application Area are as follows:

- Short-tailed Mouse *Leggadina lakedownensis* (P4)
- Unpatterned Robust Slider *Lerista macropisthopus remota* (P2)
- Western Pebble-mound Mouse *Pseudomys chapmani* (P4)
- Greater Bilby *Macrotis lagotis* (Vulnerable under the BC Act and EPBC Act)

b) Native vegetation should not be cleared if it comprises whole or part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia.

- Pilbara Leaf Nosed Bat *Rhinonictis aurantia* (Vulnerable under the BC Act and EPBC Act)
- Grey Falcon *Falco hypoleucos* (Vulnerable under the BC Act and EPBC Act)
- Night Parrot *Pezoporus occidentalis* (Critically Endangered under BC Act and Endangered under the EPBC Act)
- Pilbara Olive Python *Liasis olivaceus barroni* (Vulnerable under the BC Act and EPBC Act)
- Ghost Bat *Macroderma gigas* (Vulnerable under the BC Act and EPBC Act)
- Northern Quoll *Dasyurus hallucatus* (Endangered under the BC Act and EPBC Act).

Following a post-survey likelihood assessment conducted by AECOM, the likelihood for the following species within the Application Area was revised:

- **Short-tailed Mouse (P4)** – There are 75 records in the DBCA database. Four records occur within approximately 40 km of the Application Area and the closest within approximately 13 km. It occupies a diverse range of environments including dry tussock and hummock grasslands, Acacia woodlands, and open woodlands on heavy clay and sandy soils, often subject to seasonal inundation (DBCA n.d, Moro and Kutt 2008). The tussock grasses and Mulga Woodlands of the Clay Plain represent suitable habitat for the Short-tailed Mouse. The post-survey likelihood remains high.
- **Unpatterned Robust Slider (P2)** – There are two records in the DBCA database. The closest record occurs approximately 47 km from the Application Area. This species occupies Acacia shrublands and woodlands in semi-arid to arid habitats (Wilson and Swan 2021). Limited data exists for the Unpatterned Robust Slider and its only known from a few locations and specimens. Considering that the Application Area is in the suitable climate region and contains suitable habitat within the Clay Plain habitat and Mulga Woodland microhabitat, the post-survey likelihood remains high.
- **Western Pebble-mound Mouse (P4)** – There are 647 records in the DBCA database and 1,187 records in the Rio Tinto database with the closest recorded approximately 320 metres from Application Area. This species is associated with pebbly soils in arid tussock grassland and Acacia woodland (Burbidge 2016). The Stony Plain habitat within the Application Area contains suitable substrates and suitable habitat for the species. Two old Western Pebble-mound Mouse mounds were recorded in the Stony Plain habitat. The post-survey likelihood remains high.
- **Greater Bilby** – Vulnerable under the BC Act and EPBC Act. There are six records in the DBCA database with the closest recorded approximately 10 km from the Application Area. All records are more than 20 years old. This species is associated with sandy plains but can also burrow and forage in softer stony substrates where conditions allow (DCCEEW 2023). No critical habitat is present in the Application Area. Suitable foraging habitat in the form of sandy substrates are also largely absent, and no burrows or signs of activity were recorded during the survey. The likelihood has been reduced from high to low.
- **Pilbara Leaf Nosed Bat** - Vulnerable under the BC Act and EPBC Act. There are 167 records in the DBCA database and 572 records in the Rio Tinto database, of those records, 11 DBCA records and 3 Rio Tinto records are within approximately 30 km of the Application Area, with the closest record within approximately 20 km. Nearby records are mostly associated with gorges and gullies. The species depends on warm, humid underground diurnal roosts to maintain heat and water balance, which are critical for their survival in the Pilbara (TSSC 2016). Open grassland and woodland represent Priority 5 foraging habitat (lowest priority), including *Triodia*-dominated lowland plains and colluvial slopes and hilltops (TSSC 2016). Given the proximity to potential roosting habitat in nearby ranges, the Stony and Clay Plain habitats within the Application Area may be used opportunistically for foraging. While the available habitat is unlikely to be critical for the survival of the species, the post-survey likelihood remains moderate.
- **Grey Falcon** - Vulnerable under the BC Act and EPBC Act. There are seven records in the DBCA database and one record in the Rio Tinto database with the closest recorded approximately 16 km from the Application Area. The species frequents lowland plains, particularly Acacia shrublands that are crossed by tree-lined water courses. The species has been observed hunting in treeless areas and in tussock grassland and open woodland (TSSC 2020). This avian species is highly mobile and may utilise the Application Area as a vagrant visitor based on proximity of known records and habitat suitability. It is unlikely that the species will rely on the habitat for survival. The post-survey likelihood remains moderate.

b) Native vegetation should not be cleared if it comprises whole or part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous to Western Australia.

- **Night Parrot** - Critically Endangered under BC Act and Endangered under the EPBC Act. The closest confirmed records are approximately 30 km from the Application Area and were recorded in 2017. Night Parrots are strongly associated with long-unburnt old-growth spinifex (*Triodia* spp.), typically > 20 years unburnt, which they rely on for diurnal roosting and nesting. The fire age of the spinifex in the survey area is estimated at 2-10 years, rendering it unsuitable for these purposes. The Application Area may provide marginal seasonal foraging habitat, particularly when spinifex is seeding, however foraging is usually within 10 km of suitable roosting and nesting habitat (DPaW 2017, DCCEEW 2025b). Considering the lack of critical habitat required for ongoing use within the Application Area, the post-survey likelihood was reduced to low.
- **Pilbara Olive Python** – Vulnerable under the BC Act and EPBC Act. There are 50 records in the DBCA database, with eight records within approximately 40 km and the closest recorded approximately 16 km from the Application Area. The Pilbara Olive Python is associated with rocky environments such as escarpments, gorges, rock piles and waterholes (DCCEEW 2008). Most records occur within the ranges and gorges of Karijini National Park and surrounding area, which are considered critical habitat for the species. While the Pilbara Olive Python may occur as an occasional transient visitor to the Application Area, suitable shelter is limited. Given the large extent of preferred habitat in the surrounding landscape, the post-survey likelihood has been reduced from high to low.
- **Ghost Bat** – Vulnerable under the BC Act and EPBC Act. There are 447 records in the DBCA database and 209 records in the Rio Tinto database. There are 29 DBCA records within approximately 10 km of the Application Area and the closest within approximately 2 km. The closest Rio Tinto record occurs within approximately 27 km of the Application Area. It inhabits open woodlands and arid areas, roosting in caves, rock crevices and disused mine adits (DCCEEW 2016). The survey area does not support diurnal roost for the species, but considering there are confirmed records in close proximity within the ranges of Karijini National Park and the species is known to forage up to 12 km of their diurnal roosts, foraging may occur in the Application Area (Bullen 2021). The post-survey likelihood remains high.
- **Northern Quoll** - Endangered under the BC Act and EPBC Act. There are 521 DBCA and 317 Rio Tinto records with the closest within approximately 36 km and 9 km of the Application Area respectively. The Northern Quoll primarily utilises rocky hills, slopes and rock piles which provide foraging opportunities, shelter and denning sites, and they may opportunistically forage in less rugged habitats according to season and availability (Hill and Ward 2010). Stony Plain and Mulga Woodland microhabitat within the Clay Plain habitat offer supporting habitat for the Northern Quoll for opportunistic foraging within the Application Area. Most regional records are associated with the Hamersley Ranges, which provide higher quality habitat and better protection from feral predators. The species may occur as a transient visitor and may use the Application Area opportunistically when foraging resources are available, but it is unlikely that the species will rely on the habitat for survival. The likelihood has been reduced from high to moderate.

Given the extensive availability of intact native vegetation with similar habitat and vegetation features throughout the surrounding region, the clearing will not disrupt fauna movement corridors or stepping stones, and edge to area ratios remain unaffected. Consequently, the proposed clearing will not result in fragmentation, or the loss of key habitat features for native fauna species. The proposed clearing is therefore not at variance with this principle.

Table 4 Assessment against principle (c)

c) Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, rare flora.

Not at variance with this principle.

No Threatened flora species listed under the BC Act or EPBC Act were recorded within the Application Area (AECOM 2026). Given the Application Area does not contain any Threatened flora species, and no Threatened species were assessed as having a high likelihood of occurrence, it is unlikely that the proposed work within the Application Area will impact any Threatened flora. Therefore, the proposed clearing is not at variance with this principle.

Table 5 Assessment against principle (d)

d) Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a threatened ecological community.
Not at variance with this principle.
Through the desktop assessment, AECOM (2026) did not identify any TECs likely to occur within a 50 km buffer from the Application Area. No vegetation types recorded within the Application Area were considered analogous to TECs. Given the above, the proposed clearing (35 ha) will not directly or indirectly impact TEC vegetation and is therefore considered not at variance with this principle.

Table 6 Assessment against principle (e)

e) Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.					
Not at variance with this principle.					
The Application Area occurs within the Hamersley subregion, which is part of the Pilbara Interim Biogeographic Regionalisation for Australia (IBRA) region (DCCEEW 2025). One pre-European vegetation association intersects the proposed Application Area, association 18, which is characterised as low woodland, open low woodland or sparse <i>Acacia aneura</i> (Mulga) and associated species (Beard, et al. 2013). The Department of Environmental Regulation (DER) (now Department of Water and Environmental Regulation (DWER)) guidelines (2014) state that the retention of 30% or more of the pre-clearing extent of each ecological community is necessary if Australia’s biological diversity is to be protected. The extent remaining of vegetation Association 18 exceeds this threshold, with over 99% remaining at the state, bioregion and local government levels. Relevant statistics for this vegetation association are presented in the table below with data sourced from the ‘Statewide Vegetation Statistics’ (GoWA 2019):					
Vegetation Association	Scale	Pre-European extent (ha)	Current extent (ha)	Percentage Remaining (%)	% Current Extent in DBCA managed lands (proportion of Current extent)
18	Statewide	19,892,306.46	19,843,148.07	99.75%	6.64%
	IBRA bioregion Pilbara	676,556.72	671,843.35	99.30%	25.35%
	IBRA subregion Hamersley	581,246.08	576,541.70	99.19%	29.54%
	Local Government Authority (LGA) Shire of Ashburton	342,205.94	341,418.22	99.77%	48.33%
Vegetation association 18 has over 30% remaining across the state, IBRA region and subregion, and LGA levels. The proposed clearing (35 ha) represents 0.01% of the current LGA level extent. The Application Area is not within an area that has been subject to extensive clearing, and the proposed clearing of 35 ha will not have a significant impact on the remaining extent of native vegetation within the local area or bioregion. The proposed clearing, therefore, is considered not at variance with this principle.					

Table 7 Assessment against principle (f)

f) Native vegetation should not be cleared if it is growing in, or in association with, an environment associated with a watercourse or wetland.
Not at variance with this principle.
The Application Area occurs within the Pilbara Surface Water Area and the Pilbara Groundwater Area, both proclaimed under the <i>Rights in Water and Irrigation Act 1914-1964 Act</i> (RIWI Act). No Ramsar wetlands or Public Drinking Water Source Area (PDWSA) intersect with the Application Area or are located within a 50 km buffer. A Minor River is located approximately 235 m south of the Application Area. The proposed clearing is not expected to result in any direct or indirect impacts to any watercourse or wetland. AECOM (2026) recorded two vegetation communities within the Application Area, including: • AaSaTm - <i>Acacia aptaneura</i> low open woodland over hummock grasses and mixed tussock • EgHgTp - <i>Eucalyptus gamophylla</i> mallee woodland over mixed shrubs. These vegetation communities are not characteristic of riparian vegetation. As no watercourses or wetlands occur within, or ecologically connected the Application Area, the proposed clearing is not at variance with this principle.

Table 8 Assessment against principle (g)

g) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.
Not at variance with this principle.
The Application Area intersects two Land Systems: • Wannamunna system - characterised as hardpan plains and internal drainage tracts supporting mulga shrublands and woodlands and occasionally eucalypt woodlands • Boolgeeda system - characterised with stony lower slopes and plains below hill systems supporting hard and soft spinifex grasslands or mulga shrublands. The Wannamunna Land System is not generally susceptible to erosion, although grazing may lead to land degradation (van Vreeswyk, et al. 2004). The Application Area is located on Juna Downs Pastoral Station. The Boolgeeda Land System, being dominated by spinifex grasses, is not considered at risk of overgrazing (van Vreeswyk, et al. 2004). Therefore, the system is generally not prone to degradation from grazing pressure. The Application Area is not located in a potentially wet area and clearing is unlikely to result in appreciable land degradation including impacts on soil structure, salinity or erosion risk, therefore, the proposed clearing is not at variance with this principle.

Table 9 Assessment against principle (h)

h) Native vegetation should not be cleared if the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area.
Not at variance with this principle.
The Application Area is located 207 m north-east of an Environmentally Sensitive Area (ESA), Karijini National Park. No other conservation areas are located within 50 km of the Application Area. The proposed clearing (35 ha) will not have a direct or indirect impact on the National Park, therefore the clearing is not at variance with this principle.

Table 10 Assessment against principle (i)

i) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water.
Not at variance with this principle.
The Application Area occurs within the Pilbara Surface Water Area and the Pilbara Groundwater Area, both proclaimed under the RIWI Act. The closest watercourse to the Application Area is a Minor River located approximately 235 m south of the Application Area. The proposed clearing is not expected to have any direct or indirect impacts on this watercourse, Surface Water Area or on the Groundwater Area. Given the low-impact nature of the project, clearing is unlikely to cause increased sedimentation or run-off, or to indirectly impact groundwater or surface water quality or hydrology. Therefore, the project is considered not at variance with this principle.

Table 11 Assessment against principle (j)

j) Native vegetation should not be cleared if clearing the vegetation is likely to cause, or exacerbate, the incidence or intensity of flooding.
Not at variance with this principle.
The Application Area is located in the Pilbara region, which experiences a semi-arid climate characterised by very hot summers between October and April, with heavy rainfall from cyclones, followed by mild, dry winters between May and September. The mean annual rainfall of the local area is 313 mm, based on Paraburdoo Aero Station 007185. (BoM 2026). The Application Area occurs within the Pilbara Surface Water Area, which is protected under the Section 27 of the RIWI Act. A Minor River located approximately 235 m south of the Application Area. The Application Area intersects two land systems, including: • Boolgeeda system - Stony lower slopes and plains below hill systems supporting hard and soft spinifex grasslands or mulga shrublands • Wannamunna system - Hardpan plains and internal drainage tracts supporting mulga shrublands and woodlands and occasionally eucalypt woodlands. The proposed clearing is not located in a flood-risk area (potentially wet area, wetland/dampland, drainage channel) and is unlikely to cause waterlogging or localised flooding. Given the low rainfall in the Application Area, the proposed clearing is not expected to cause, or exacerbate the incidence or intensity of flooding, and is therefore considered not at variance with this principle.

5.0 Conclusion

Rio Tinto proposes to clear up to 35 ha of native vegetation to rebuild the decommissioned Wildflower Camp site, located approximately 85 km east of Tom Price. As the clearing must be undertaken under an approved NVCP, an NVCP application is required.

To support the NVCP application, Rio Tinto commissioned AECOM to undertake a biological survey and assess the proposed clearing against the 10 Clearing Principles set out in Schedule 5 of the EP Act.

The survey was conducted in accordance with the EPA's technical guidance for flora and vegetation surveys, with no major limitations identified. The survey was conducted during optimal seasonal conditions and included systematic coverage of the Application Area, ensuring robust baseline data.

Key findings include:

- Flora and Vegetation
 - No Threatened or Priority Ecological Communities are considered likely to occur within the Application Area
 - No Threatened flora species are considered likely to occur within the Application Area
 - One Priority flora species occurs within the Application Area: *Vittadinia* sp. Coondewanna Flats (S. van Leeuwen 4684) (P3)
- Fauna
 - No Threatened fauna species are known to occur within the Application Area
 - Three fauna habitats occur within the Application Area and potentially can be utilised by Threatened species as supporting habitat (Clay Plain, Stony Plain and Rehabilitated area)
- Surface water
 - A Minor River is located approximately 235 m south of the Application Area.

An assessment against the 10 clearing principles under Schedule 5 of the EP Act found the following:

The clearing is not at variance with the following principles:

- Principle (a), which relates to the clearing of vegetation with a high level of biological diversity
- Principle (b), which relates to significant habitat for fauna indigenous to Western Australia
- Principle (c), relates to disturbance of vegetation that includes or is necessary for the continued existence of rare flora
- Principle (d), maintenance of TECs
- Principle (e), remnant native vegetation
- Principle (f), which relates to vegetation associated with watercourse and wetlands
- Principle (g), related to land degradation
- Principle (h), relates to environmental values of any adjacent or nearby conservation area
- Principle (i), relates to the quality of surface or underground water
- Principle (j), relates to flooding.

This conclusion aligns with the application of the mitigation hierarchy, ensuring that potential environmental impacts associated with the clearing are avoided, minimised, and managed effectively.

Kind regards



Floora de Wit
Associate Director - Natural Resources
floora.dewit@aecom.com

Mobile: +61 439 727 543

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